UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460



OFFICE OF AIR AND RADIATION

April 28, 2006

Dear ENERGY STAR® Roof Products Partner or Other Industry Stakeholder:

EPA welcomes your input on the attached **Draft 2** ENERGY STAR specification (Version 2.0) for Roof Products. This Draft 2 specification addresses the key comments received from stakeholders on the previous Draft 1 document. Specifically, stakeholders will notice the following features of this latest version:

- The definition of Steep-Slope roof products now includes metal shingles as a product type. In conjunction with this change the definition of a Metal Roof Panel has been rewritten for clarification.
- Alternative roof technologies such as stone ballasted and green roofs are not being considered under the ENERGY STAR roof specification. However, EPA will include information about these technologies on the ENERGY STAR Web site and in marketing materials.
- EPA is continuing to require a minimum thermal emittance requirement of 0.75 because of the significant energy savings that could result from high emittance, especially in warmer climates, and in the interest of remaining consistent with other cool roofing programs.
- EPA is retaining the existing 0.65 solar reflectance requirement due to the fact that increasing it to 0.70, as was proposed in the previous Draft 1 version, would eliminate a significant number of products and yield only minimal additional savings.
- The proposed effective date has been extended to January 31, 2007 to allow partners approximately 9 months to qualify products under the new specification.
- New product submittals must be tested on uncleaned samples in order to determine the aged reflectance value. Previously qualified ENERGY STAR roof products continue to be exempt from the new requirement to test for maintenance of solar reflectance on uncleaned samples.

More details regarding EPA's rationale for proposing these Draft 2 requirements are included in note boxes throughout the document.

EPA intends to finalize this specification by the end of May of this year. As such, all stakeholders are encouraged to provide any final concerns and comments for EPA consideration to Charles Anderson, ICF Consulting, at canderson@icfconsulting.com by **May 12, 2006**. All comments received from stakeholders on the Draft 1 specification for which EPA received permission to post on the Web site are available on the ENERGY STAR Product Development Web page at www.energystar.gov/productdevelopment. In order to expedite the posting of comments on the Draft 2 specification, when submitting comments,

please indicate whether EPA has permission to post them on the ENERGY STAR Web site along with your feedback.

Finally, EPA has recently been informed about the possible development of an accelerated aging test to simulate the results of the required maintenance of solar reflectance test in the specification. This testing would be done by Atlas Material Technical Technology. In order for the appropriate testing to be conducted to assess an accelerated aging test's ability to replicate aged roof reflectance testing in the field, a minimum of 10, preferably more, roofing materials must be tested. Any partners interested in contributing materials to aid the creation of this test procedure are encouraged to contact Norma D. Searle at <a href="mailto:nds-add-nds-nds-a

Thank you in advance for taking the time to review Draft 2 specification and for your continued support of ENERGY STAR. Please feel free to contact me directly with any questions or concerns at ryan.steven@epa.gov or (202) 343-9123.

Sincerely,

Steven J. Ryan, U.S. EPA

ENERGY STAR for Roof Products